OCT 1 6 2018

# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF ILLINOIS

CLERK, U.S. DISTRICT COURT SOUTHERN DISTRICT OF ILLINOIS EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,	)
Plaintiff,	CRIMINAL NO. 18-30164-SMY
vs.	) Title 18, United States Code Sections ) 2251(a) and (e) and 2253
TYLER S. SEIBOLD,	
Defendant.	

### INDICTMENT

#### THE GRAND JURY CHARGES:

## COUNT 1 PRODUCTION OF CHILD PORNOGRAPHY

On or about June 17, 2017, within the Southern District of Illinois,

#### TYLER S. SEIBOLD.

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, that being a digital photograph depicting the lascivious display of her genitals, and the visual depiction had been produced using materials that had been mailed, shipped, or transported in and affecting interstate and foreign commerce by any means, including by computer, and that such visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate of foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

### COUNT 2 PRODUCTION OF CHILD PORNOGRAPHY

On or about September 2, 2017, within the Southern District of Illinois and elsewhere,

#### TYLER S. SEIBOLD,

defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor female to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and attempted to do so, that being a digital photograph depicting the lascivious display of her genitals, such visual depiction having been transported from outside the State of Illinois into the State of Illinois, specifically the Southern District of Illinois, all in violation of Title 18, United States Code, Section 2251(a) and (e).

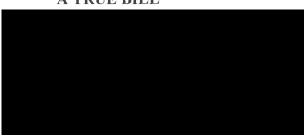
#### FORFEITURE ALLEGATION

Upon conviction for the offenses charged defendant, **TYLER SEIBOLD**, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2253, any and all material that contained any images of child pornography and any and all property used and intended to be used in any manner or part to commit and to promote the commission of the aforementioned offenses.

The property that is subject to forfeiture referred to above includes, but is not limited to, the following items all seized from the presence of Tyler Seibold:

- 1) A black Samsung Galaxy 8 branded mobile phone, Serial Number R38J90FLJEA;
- A Samsung Galaxy 3 J320a branded mobile phone, Serial Number R28HB2962WZ;
- 3) A Samsung J320a branded mobile device, Serial Number R28HB2962WZ;
- 4) Hewlett Packard Laptop, Serial Number CND428F18;
- 5) 16 gigabyte PNY external flash drive;
- 6) 32 gigabyte PNY flash drive;
- 7) Asus brand laptop, Model Number GL502V, Serial Number GCNOCV16N69451D.

A TRUE BILL



CHRISTOPHER R. HOELL Assistant United States Attorney

STEVEN D. WEINHOEFT United States Attorney

Recommended Bond: Detention